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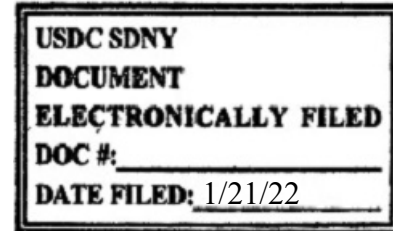
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01/19/2022

*Document Electronically Filed*

Hon. Barbara C. Moses  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312



Re: Flanders v. Commissioner of Social Security  
Docket No: 1:21-cv-02867-AT-BCM

**MEMO ENDORSED**

Dear Judge Moses:

This letter respectfully requests an extension of time of 60 days for Plaintiff to file their motion for Judgment on the Pleadings in this matter. Plaintiff's Brief is currently due on January 31, 2022, however, Plaintiff cannot complete the Brief on time.

The Defendant was unable to produce CARs during the early stage of the pandemic. Now the Defendant is producing 700 CARs a week and has served over a years' worth of transcripts in a very short period of time. As a result, Plaintiff's counsel has multiple simultaneous filing deadlines that cannot be met.

Plaintiff's counsel has contacted defense counsel who has consented to this motion. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on April 1, 2022. The Commissioner's response would be due 60 days thereafter.

**No further extensions will be granted.**

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.  
Counsel for Plaintiff

CC [via ECF]: Oona Marie Peterson, Counsel for Defendant

**SO ORDERED.**

Dated: 1/21/22

New York, NY

A handwritten signature in blue ink, appearing to read "Barbara C. Moses".

**Honorable Barbara C. Moses**  
**U.S. Magistrate Judge**